

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

:
LINDA J. BLOZIS : CIVIL ACTION NO. 05-891 (SLR)
Plaintiff, :
vs. :
MELLON TRUST OF DELAWARE, :
NATIONAL ASSOCIATION; MELLON :
BANK, NATIONAL ASSOCIATION; :
MELLON FINANCIAL CORPORATION, :
Defendants. :
:

DECLARATION OF STEPHANIE WILSON, ESQ.

I, Stephanie Wilson, of full age, hereby certify and declare as follows
based upon my own personal information:

1. I am a partner at Reed Smith and have been admitted pro hac vice in this proceeding. I make this Declaration based on personal knowledge.

2. Prior to Plaintiff's July 26 deposition Defendants served document and interrogatory requests. They have subpoenaed documents from Plaintiff's two Florida employers, inclusive of her present employer, and have received them. Plaintiff has just served document and interrogatory requests on November 16, 2006 and have not noticed any depositions. Fact discovery is scheduled to end on December 29, 2006.

3. On July 26, 2006, I deposed Plaintiff, but did not complete Plaintiff's deposition. As the Court can see, the deposition was conducted properly and efficiently. A true and complete copy of the deposition transcript without exhibits is attached hereto as Exhibit 1.

4. As part of discovery, Defendants have sought the medical records from Plaintiff's health providers. After receipt of Plaintiff's medical authorizations, Defendants have subpoenaed sixteen (16) providers and to date have received all but one (1) medical file.

5. Defendants anticipate, barring any unusual occurrence, needing one additional day to complete Plaintiff's deposition.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Stephanie Wilson

Dated: November 21, 2006